

FILED/ACCEPTED

AUG - 3 2011

Federal Communications Commission
Office of the Secretary

LightSquared modification (SAT-MOD-20101118-00239)

To whom it may concern,

I am writing in regard to the FCC's conditional approval of LightSquared's use of spectrum that WILL cause interference on literally millions of existing GPS devices in use not only by recreational users but also by commercial interests.

In January, the Federal Communications Commission (FCC) conditionally allowed a company called LightSquared to offer wireless broadband services in radio frequency bands adjacent to those used by GPS receivers. Based on feedback from public and private sector GPS users, the FCC told LightSquared that it could not launch service until testing could be completed to determine the extent of the problems that LightSquared would cause. The report of that testing was submitted to the FCC on June 30, 2011 and it showed that there would be massive interference to GPS from LightSquared's proposed operations. The FCC has asked for feedback from the public on the report.

The FCC must make clear, and the NTIA must ensure, that LightSquared's license modification is contingent on the outcome of the mandated study unequivocally demonstrating that there is no interference to GPS. The study must be comprehensive, objective, and based on correct assumptions about existing GPS uses rather than theoretical possibilities. Given the substantial pre-existing investment in GPS systems and infrastructure, and the critical nature of GPS applications, the results of studies must conclusively demonstrate that there is no risk of interference. If there is conflicting evidence, doubts must be resolved against the LightSquared terrestrial system. The views of LightSquared, as an interested party, are entitled to no special weight in this process.

The FCC should make clear that LightSquared and its investors are proceeding at their own risk in advance of the FCC's assessment of the working group's analysis. While this is the FCC's established policy, the Commission's International Bureau failed to make this explicit in its order.

Resolution of interference has to be the obligation of LightSquared, not the extensive GPS user community of millions of citizens. LightSquared must bear the costs of preventing interference emanating from their devices, and if there is no way to prevent interference, it should not be permitted to operate. GPS users or providers should not have to bear any of the consequences of LightSquared's actions.

This is a matter of critical national interest. There must be a reasonable opportunity for public comment of at least 45 days on the report produced by the working group and further FCC actions on the LightSquared modification order should take place with the approval of a majority of the commissioners, not at the bureau level.

As a recreational boater who uses my GPS every single time I board my boat I must protest any action the endangers myself, my family, my guests, my fellow boaters, or my personal property. Additionally, the expense to replace effected GPS units will be staggering as there are millions of these devices already in use today. Mine alone will be in excess of one thousand dollars. That is for one small boat with ONE GPS unit.

My GPS is irreplaceable when it comes to navigation. There is NO other technology available that will provide for the safe navigation of the waters I frequent. THERE IS NO FEASIBLE ALTERNATIVE TO GPS FOR THE MILLIONS OF UNITED STATES CITIZENS WHO USE AND RELY ON IT EVERY DAY.

No. of Copies rec'd 0
List ABCDE

8/3/11

Please reconsider as a decision that favors LightSquared's plan WILL endanger countless human lives. The potential losses to personal property and expenses to transition to a new, currently unidentified/unavailable technology will be counted in billions of dollars.

Thank you,
Russell C. Dent
12600 NE 9th Street
Vancouver, WA 98684
(360)256-8278